Oil Conservation Division Engineering and Geological Services Bureau Oil Conservation Division 1220 S. St Francis Drive Santa Fe, NM 87505

Re:

CASE NO. 14613 (Re-opened)

APPLICATION OF APACHE CORPORATION AND COG OPERATING LLC

TO AMEND ORDER NO. R-13382, ETC. LEA AND EDDY COUNTIES, NEW MEXICO

To Whom It May Concern:

Clayton Williams Energy, Inc. respectfully submits this letter in support of Applicants Apache Corporation and COG Operating, LLC in their efforts to increase the allowable in the order referenced above.

As an operator in New Mexico, Clayton Williams Energy, Inc. supports measures under consideration by the Division to more suitably accommodate the increase in horizontal development in New Mexico. Approving the allowable as requested by the applicants will encourage horizontal development across the State by removing arbitrary and restrictive allowable limits more suited to vertical development. Clayton Williams Energy, Inc. encourages the Division to review and approve the applicants' request as it benefits not only the operator, but the royalty owner and the State, as well.

Thank you for the opportunity to enter our support of this petition.

Sincerely,

Matt Swierc

**Regulatory Coordinator**